March 25, 2010

Via Electronic Delivery

Ms. Marlene H. Dortch
Federal Communications Commission
The Portals, TW-A325
445 12th Street SW
Washington, DC 20554

> Re: Notice of *Ex Parte* Presentation –WC Dkt. 09-95, *Application of Verizon Communications Inc. and Frontier Communications Corporation for Consent to Transfer Control of Domestic Section 214 Authority*

Dear Ms. Dortch:

At the request of FCC staff, on March 24, 2010, Penny Bewick, Vice President, External Affairs, New Edge Network, Inc. ("New Edge") and also representing EarthLink, Inc. ("EarthLink"), and Jennifer Bagg and Justin Faulb, Lampert, O'Connor & Johnston, P.C., met in person and by telephone with members of the Verizon-Frontier transaction team to discuss issues with the transfer of Verizon's operation support systems ("OSS") and associated Application Programming Interfaces ("API") for broadband services. Present at the meeting were Don Stockdale, Alex Johns, Carol Simpson, Nick Alexander, Jenny Prime, Bill Dever and Matt Warner of the Wireline Competition Bureau; Steve Rosenberg and Paul de Sa of the Office of Strategic Planning and Policy Analysis; and Jim Bird and Virginia Metallo of the Office of General Counsel.

As recognized by the FCC in the National Broadband Plan, the offering of wholesale broadband service is essential to the growth of broadband deployment throughout the nation.[1] EarthLink and New Edge are concerned, however, that Verizon's recent actions in transferring the current Verizon OSS to a duplicated OSS system in preparation for the Verizon-Frontier transaction will negatively impact this goal, especially as it affects EarthLink's primarily residential broadband customers in the mostly rural spin-off territories that are the subject of this transaction. To date, the actions Verizon has taken in connection with the proposed transaction raise serious concerns and doubts that the FCC's well-articulated broadband goals will be realized in these spin-off territories once the transaction is approved and the spin-off is effectuated. Of course, we recognize that Verizon can implement OSS system changes in the

---

[1] *Connecting America: The National Broadband Plan* at 47, GN Dkt. 09-51 (rel. Mar. 16, 2010) ("Ensuring robust competition not only for American households but also for American businesses requires particular attention to the role of wholesale markets, through which providers of broadband services secure critical inputs from one another.")

regular course of business; indeed, we have successfully implemented such changes with Verizon numerous times in the past. In the context of this transaction, however, Verizon's actions to date show that the normal dynamics have changed as a direct result of the proposed spin-off transaction and the normal contractual incentives, in which contracting parties are mutually incented to work with one another to implement changes as seamlessly as possible, simply do not apply.

Of significant concern to EarthLink is the period from March 29 to May 6, 2010, when EarthLink will not be able to access the duplicated electronic Verizon OSS system for the Verizon territories that Verizon has proposed be transferred to Frontier (the "SpinCo Territories"). As evidenced in the attached Exhibits, and described in more detail below, EarthLink has worked diligently to implement all OSS system changes as requested by Verizon. By way of clarification, there are two OSS system changes that are occurring within a matter of days.

OSS System Change 1: EarthLink received notice on October 21, 2009, that Verizon would be implementing a Verizon OSS system change (called by Verizon the "Broadband Ordering System Conversion"), so that Verizon could add a real time interface into the OSS ordering system. At the same time, Verizon provided documentation in the "ISP Gateway Kit V1.34" attached to the notice that details the specifications to implement the real time interface. *See* Exh. 1, attached.[2]

EarthLink and Verizon worked together diligently to implement OSS System Change 1 in order to complete successfully the necessary coding by March 25, 2010 On March 20, 2010, Verizon decommissioned the existing ordering server and is expected to have the new real time ordering system up on March 26, 2010.[3] During the interval between the decommissioning of the existing server and the implementation of the new server with the real time interface, EarthLink was able to pre-qualify customers and issue trouble tickets because these systems were not affected by OSS System Change 1, but EarthLink was not able to place orders on the electronic OSS system. Instead, Verizon proposed EarthLink place orders using the Verizon Graphical User Interface ("GUI"). From EarthLink's perspective, this was not a wholly adequate proposal because EarthLink would not be able to complete certain order fulfillment

---

[2] The ISP Gateway Kit V1.43 contains all the specification for OSS System Change 1; however, it contains a notice that information within the document is proprietary and confidential and may only be disclosed pursuant to Verizon's written agreement. EarthLink has asked Verizon for permission to provide this and other proprietary documents referred to herein to FCC staff, but has not yet received a response.

[3] Note that Exh. 2 to the Verizon ex parte letter of March 23, 2010, stating that EarthLink was "on track for a 3/26 release," was in relation to OSS System Change 1. While the original email chain this message was extracted from has been purged during routine maintenance of the senders email storage system, other correspondence confirms EarthLink and Verizon were working cooperatively and in a timely manner to implement the OSS System Change 1. *See* Exh. 1, attached.

processes such as initiating a customer account and billing (due to the fact that the GUI and the EarthLink ordering implementation system do not communicate with one another). However, given the short time period during which EarthLink would not have access to the electronic OSS ordering system, and the fact that EarthLink could still submit pre-qualification requests and trouble tickets, EarthLink was able to accommodate use of the GUI without a significant impact on operations.

Notably, EarthLink and Verizon were able to agree to a significant extension to the original completion date of the OSS System Change 1 due to the complexity of the process for implementing the real time interface. EarthLink estimates that approximately 550 hours went into the coding for OSS System Change 1, with changes being made to the code up and until March 19, 2010, due to a bug found during testing.

OSS System Change 2: EarthLink received notice on December 11, 2009, that Verizon planned to implement a second and separate OSS system change. The Verizon notice indicated that the change was necessary to create a duplicated system for the proposed Verizon-Frontier transaction. Verizon provided documentation regarding the change in the "ISP Gateway Kit V1.35" attached to the notice. *See* Exh. 2, attached. [4] Verizon stated the coding for the duplicated system for use in SpinCo Territories must be completed by March 26, 2010, and that use of the existing Verizon OSS System for this territory would be decommissioned on March 29, 2010. EarthLink responded to Verizon's notice on December 14, 2009, and raised numerous questions regarding the specifications provided and the information contained in the notice and documentation. Among the questions asked of Verizon was whether there were any changes to the coding EarthLink had begun for the OSS System Change 1. In addition, EarthLink asked several other questions regarding the specifics of this system change, including requests for information from Verizon that would be necessary for EarthLink to begin the implementation of OSS System Change 2. In sum, the specifications provided by Verizon were inadequate to enable EarthLink to fully understand the scope of the requested change. Furthermore, as a prerequisite to duplicating the Verizon OSS system as requested in OSS System Change 2, the completion of the real time interface coding under OSS System Change 1 was required. *See* Exh. 2, attached.

On January 15, 2010, EarthLink had not received a response from Verizon and sent a follow-up email, which contained additional questions regarding OSS System Change 2. *See* Exh. 2, attached. On January, 21, 2010, EarthLink had still not received a response to either the December 14, 2009, email or the January 21, 2010, email and, therefore, sent a further follow-up email which indicated that without the answers to the relevant implementation questions

---

[4] The ISP Gateway Kit V1.35 contains the specifications for the changes related to the proposed Verizon-Frontier transaction, but this also may only be disclosed with Verizon's written agreement. As described in the EarthLink and New Edge March *ex parte* filing of March 11, 2010, this notice described changes that were necessary in order to effectuate the Verizon-Frontier transaction and included references to Verizon, Frontier, RetainCo and SpinCo.

EarthLink was unable to begin the requested work on OSS System Change 2. *See* Exh. 2, attached. On January 26, 2010, Verizon responded to EarthLink's questions and provided the majority of the additional clarity necessary to begin implementing OSS System Change 2. Subsequently, on February 8, 2010, EarthLink received an "ISP Communication" and had a telephone conversation with Verizon that described the OSS System Change 2 as an internal realignment, purportedly not related to the Verizon-Frontier transaction, and provided additional details and clarification on OSS System Change 2.[5]

A key component to the OSS System Change 2 is that OSS System Change 1 had to be implemented *prior* to any coding began for OSS System Change 2. EarthLink was well into development of the real time interface coding for the OSS System Change 1 when it received notice regarding the coding necessary for OSS System Change 2 and, thus, the timing of Verizon's two announcements prevented EarthLink from coding for OSS System Change 2 until it had completed coding for OSS System Change 1.[6] Significantly, the OSS System Change 2 presumes that EarthLink orders using the real time interface and, thus, the real time interface coding was a prerequisite to the duplicated OSS system coding for OSS System Change 2. Furthermore, OSS System Change 2 included additional changes to coding for trouble tickets, due to a change in the vendor that would handle trouble tickets in the SpinCo, which is an extensive, time consuming process.[7] EarthLink notified Verizon that it was unable to implement OSS System Change 2 by the March 26, 2010, completion date due to the timing of completion for OSS System Change 1 and reasonably expected to be completed by May 5, 2010. EarthLink has estimated that the changes for OSS System Change 2 will take approximately 490 hours.[8]

Notably, Verizon and EarthLink have worked efficiently and successfully together in the past to implement other OSS system changes, including OSS System Change 1. In the case of OSS System Change 2, however, EarthLink's ability to implement the changes was severely limited by Verizon's failure to provide EarthLink the necessary implementation information in a

---

[5] The ISP Communication may only be disclosed with Verizon's written agreement.

[6] Alternatively, it is possible EarthLink could have coded simultaneously for OSS System Change 1 and OSS System Change 2. However, since EarthLink was well into development for OSS System Change 1 by the time Verizon provided notice and responded to the numerous inquiries regarding implementation of OSS System Change 2, it was not practical for EarthLink to stop coding for OSS System Change 1 and start over with the simultaneous coding approach. As such, the only reasonable approach was to finish coding for OSS System Change 1 before beginning the coding of OSS System Change 2.

[7] Thus, it seems that calling OSS System Change 2 a mere duplication of the existing Verizon system is not entirely accurate, as trouble tickets are being handled differently in the SpinCo Territories and further coding required to implement that change. *See* Exh. 3, attached (confirming the new vendor for the SpinCo Territories that has already been implemented).

[8] Some of the larger changes EarthLink must make under OSS System Change 2 are described in correspondence from the EarthLink Broadband Vendor Manager. *See* Exh. 4, attached.

timely manner. Further, EarthLink is a relatively small company with limited resources to respond as quickly to Verizon's requested changes as Verizon may prefer. Moreover, of the gravest concern to EarthLink is the impact that OSS System Change 2 will have on EarthLink residential broadband customers. Without the ability to pre-qualify customers, EarthLink will not be able to inform interested customers whether service is available to their home. With no access to the electronic OSS ordering system, EarthLink will be unable to sign up interested customers for broadband services. Furthermore, without the ability to issue trouble tickets, EarthLink cannot ensure existing customers are being served properly.

In response to EarthLink's concerns regarding the March 29 cutover to the duplicated OSS system under OSS System Change 2, on March 17, 2010, Verizon delivered via email an "EarthLink Manual Work Around Proposal – March 26th – May 4th 2010." Unfortunately, the proposed manual work around is infeasible, cumbersome and essentially would thwart EarthLink's ability during this time period to serve existing customers, respond to requests for service from customers, or acquire any new customers in the areas impacted by the cutover. EarthLink's concerns with the proposal are as follows:

<u>Pre-Qualification</u>: To address the pre-qualification concerns of EarthLink, Verizon has proposed that EarthLink continue to enter pre-qualification requests into the existing Verizon OSS system that will be cutover as of March 29. Due to the cutover, the pre-qualification requests will be rejected, but Verizon proposes to retrieve manually the request on a daily basis and, within 24 hours of retrieving the requests (*i.e.*, potentially up to 48 hours after submitting a request), Verizon will inform EarthLink whether or not the requests can be fulfilled. EarthLink will then be required to contact each individual customer who had inquired about service and provide the results of the pre-qualification request. During a typical day in the affected region, EarthLink receives approximately 4,000 requests for service and, as a result, Verizon's proposed work around will result in EarthLink assuming enormous and labor-intensive steps that it would not otherwise undertake.

<u>Placing Orders</u>: As a work around to the inability to place orders on the Verizon OSS system, Verizon has proposed the following process: Once a customer is notified of the pre-qualification results and wants to order service, EarthLink must send order information to Verizon via email. Verizon will place the order within 24-hours of receipt of the email, *e.g.*, 48-72 hours – or more depending on how long it takes for EarthLink to make contact with the customer via telephone – after a customer has called EarthLink to inquire about service. In addition, Verizon has capped EarthLink's orders to 25 per day, which is significantly less than the number of customers that subscribe to EarthLink's services on any given day in the SpinCo Territory. Importantly, EarthLink has not been able to confirm access to a Verizon GUI for the new territory and, given the length of time at issue, the GUI would not be a practical alternative to placing orders on the OSS system, including for the order fulfillment concerns described above.

<u>Order Fulfillment</u>: On EarthLink's side of the ordering process, it will not be able to perform many of the order fulfillment requirements that are necessary to complete an order due to EarthLink's inability to override the original pre-qualification rejection from Verizon. This

will frustrate completely EarthLink's ability to, for instance, track the order, bill the customer, or provide customers with new email addresses.

Trouble Tickets: Verizon has proposed that EarthLink submit trouble tickets via email. This, too, is a cumbersome process with significant room for error.

In EarthLink's experience, the proposed manual process will result in delays in pre-qualifying customers, placing and fulfilling orders and responding to trouble tickets that are untenable and are likely to result in EarthLink losing numerous customers that it would otherwise have obtained or frustrating existing customers who may not receive the service they are accustomed to from EarthLink during this time period. Moreover, with a manual process for such a large number of orders, EarthLink believes it is reasonable to expect a large number of human errors, especially in the pre-qualification process, further frustrating customer expectations.

Upon receipt of the manual work around proposal, EarthLink detailed its concerns with the manual process to Verizon immediately in an email. Subsequently, on March 22, 2010, EarthLink and Verizon had further communications in which Verizon conveyed there were no alternatives to its proposal. EarthLink has requested that Verizon keep its existing OSS system operational and not implement the cutover planned for March 29 until after May 5, 2010, in order to allow EarthLink the time necessary to execute the changes necessary for OSS System Change 2.

Pursuant to the Commission's rules, one copy of this memorandum is being filed electronically in the above-referenced docket for inclusion in the public record. Please do not hesitate to contact me directly if you have any questions.

Respectfully submitted,

Jennifer P. Bagg
*Counsel for EarthLink, Inc. and
New Edge Network, Inc.*

CC (*via email*):
Alex Johns
Carol Simpson
Nick Alexander
Paul de Sa

EXHIBIT 1

From: Janet Russell [mailto:russelljan@corp.earthlink.net]
Sent: Friday, January 15, 2010 4:01 PM
To: Torrez, Margaret R (MARGARET); Balinsat, Misty D; Witt, Michele Marie
(Michele M Witt); Montalbano, Frank; Dugan, James E
Cc: Manzano, Stacey; Christopher Hight; Michael Vorp
Subject: EarthLink update - March Schedule

Margaret & Verizon Team,

As promised, EarthLink MIS and executive management met to re-assess current MIS
priorities, and as a result of delaying other corporate projects, have
established a new timeline that they believe will allow us to launch to
production the Realtime Gateway for Verizon shared line orders during March. See
schedule as follows:

Development/coding: In progress
Begin development testing: 2/15/10 thru 2/28/10
Begin QE testing: 3/1/10 thru 3/18/10
Production release: 3/25/10

This is the best scenario we can accommodate without sacrificing the required
development timeline, and also assumes no new issues are discovered during the
process. These dates also assume Verizon resources are available to support joint
testing from 2/15 thru 3/18, and longer if issues are encountered.

We appreciated the added extension agreed to below. But please let us know if
this updated schedule can be supported.

Thanks,

Janet

Janet Russell
Sr. Product Manager - Broadband Services EarthLink, Inc. - www.earthlink.net
Office: 404-748-6528
Cell: 678-612-2130

-----Original Message-----
From: Torrez, Margaret R (MARGARET) [mailto:margaret.torrez@verizon.com]
Sent: Wednesday, January 13, 2010 1:47 PM
To: Christopher Hight; Balinsat, Misty D; Janet Russell; Manzano, Stacey
Cc: Witt, Michele Marie (Michele M Witt); Torrez, Margaret R (MARGARET)
Subject: RE: EarthLink update

Hello Chris,

I informed IT/Development the information you provided below and the response is
that we stay with the 3/13/2010 date.

Margaret

Margaret,

We have a meeting with EarthLink's MIS management on Friday. The goal is to see what can be done to pull in the EarthLink release date. We cannot say with any certainty that a decision will be made that day but if not, we will have it early next week.

I looked into using a screen scrape program. Due to the way we place orders and receive order updates it would not provide any more benefit than an Excel report containing the TN, ISPGW ID, Order Type, Status, and Circuit ID. If there is a gap between implementation dates we may want to talk more about a daily order report during the outage.

Please distribute this to the rest of the team. I do not have their email addresses.

Thanks,
Chris

Chris Hight
Sr Broadband Vendor Manager
EarthLink, Inc
W: 4047487072
M: 4048409490
C@corp.earthlink.net

From: Christopher Hight [mailto:c@corp.earthlink.net]
Sent: Tuesday, October 27, 2009 4:12 PM
To: 'Torrez, Margaret R (MARGARET)'
Cc: William Polinchak; Philip Weinmeister; Janet Russell; Lori Hall; 'Kothamasu, Venkata Ravi Sekhar (Venkat)'; 'Basu, Sanjay (SANJAY)'; 'Dave, Hitesh N (Hitesh)'; 'Gopal, Kiran (KIRAN)'
Subject: RE: ISP Gateway Kit

This is great. About the disconnect orders created by Verizon, we have three of them in my systems today. They are all west.

Order ID's
VOL.5014011130.13038745
VOL.5014002737.13029172
VOL.5014007855.13034955

I am trying to find the response files that show them. These look like customers who switched from EarthLink to Verizon Online.

Thanks for the responses,
Chris

Chris Hight
Sr Broadband Vendor Manager
EarthLink, Inc
W: 4047487072
M: 4048409490
C@corp.earthlink.net

From: Torrez, Margaret R (MARGARET) [mailto:margaret.torrez@verizon.com]
Sent: Tuesday, October 27, 2009 3:15 PM
To: Christopher Hight
Cc: William Polinchak; Philip Weinmeister; Janet Russell; Lori Hall; Kothamasu, Venkata Ravi Sekhar (Venkat); Basu, Sanjay (SANJAY); Dave, Hitesh N (Hitesh); Gopal, Kiran (KIRAN); Torrez, Margaret R (MARGARET)
Subject: RE: ISP Gateway Kit

Chris,

I just got them: *Provided by Venkat Kothamasu*

_____
_____
Margaret,

Please find the answers in blue.

The spec is written with the assumption that the ISP will initiate all orders, changes, and disconnects. There are situations where Verizon will disconnect a DSL service though. How will we know if Verizon moves or disconnects a DSL circuit for say, Change ISP or non-pay of the voice services? Currently

these are inserted into the lineshare response files. We process them and they appear in my systems without any human intervention.
   -- currently ISPGateway not getting any notifications for non-pay of the voice services, Not sure from where ISP getting the response files.

On that note, there are other notifications we receive via email such as TN Ported. It would be much easier from a management standpoint to have these come to us over XML, much like the bulk Get Unprocessed Response call. Can we have this?
   --Since dryloop migration order is coming from backend, if we put the response in the xml to ISP not sure how they are going to match it up. This requires more design discussion.
   -- From ISPGateway side, if we wanted to make the change to support xml, we required code change in ISPGateway and it requires business funding.

For the Install the ATMCircuitVC and ATMCircuitVP are required fields. Since we order Layer 3, Verizon sets these fields. What should we use here?
   -- Similary like Dryloop, ISP can send the values as '0'
    <ATMCircuitVP>0</ATMCircuitVP>
    <ATMCircuitVC>0</ATMCircuitVC>

Does the Install order allow bulk orders or is it one order per transaction? I am thinking of migrations.
   --- Only one order allowed per transaction.

The ChangeOrder child element lists RequestType="Install" in the Valid Values column. Should the value for RequestType be "Change?"
   -- ChangeOrder RequestType should be "Change". we will update in the KIT

The DisconnectOrder child element lists RequestType="Install" in the Valid Values column. Should the value for RequestType be "Disconnect?"
   -- DisconnectOrder RequestType should be "Disconnect" . we will update in the KIT

The Supplemental & Cancel – Data Elements section has a child element called SupplimintOrder. Should this say SupplementOrder?

   -- This is typo. SupplimentOrder is valid.

The Valid Values for the SupplimintOrder child element list RequestType="Install." What should we use in this field for a supplement order?

   -- SupplimentOrder RequestType should be "Suppliment" . we will update in the KIT

Which order id is required for the PriorRequestID child element in the SupplimentOrder? Is it the ISPGW ID or some other value?
   -- Yes, It is ISPGateway RequestID.

Regards,
Margaret

Margaret,

I am writing the requirements for this project. Do you have any updates on these questions?

Thanks,
Chris

Chris Hight
Sr Broadband Vendor Manager
EarthLink, Inc
W: 4047487072
M: 4048409490
C@corp.earthlink.net

From: Christopher Hight
Sent: Friday, October 23, 2009 2:38 PM
To: Torrez, Margaret R (MARGARET)
Cc: William Polinchak; Philip Weinmeister; Janet Russell; Lori Hall
Subject: RE: ISP Gateway Kit

Margaret,

This new spec is well written. Good job to whoever put it together. As usual, I have some questions.

The spec is written with the assumption that the ISP will initiate all orders, changes, and disconnects. There are situations where Verizon will disconnect a DSL service though. How will we know if Verizon moves or disconnects a DSL circuit for say, Change ISP or non-pay of the voice services? Currently these are inserted into the lineshare response files. We process them and they appear in my systems without any human intervention.

On that note, there are other notifications we receive via email such as TN Ported. It would be much easier from a management standpoint to have these come to us over XML, much like the bulk Get Unprocessed Response call. Can we have this?

For the Install the ATMCircuitVC and ATMCircuitVP are required fields. Since we order Layer 3, Verizon sets these fields. What should we use here?

Does the Install order allow bulk orders or is it one order per transaction? I am thinking of migrations.

The ChangeOrder child element lists RequestType="Install" in the Valid Values column. Should the value for RequestType be "Change?"

The DisconnectOrder child element lists RequestType="Install" in the Valid Values column. Should the value for RequestType be "Disconnect?"

The Supplemental & Cancel – Data Elements section has a child element called SupplimintOrder. Should this say SupplementOrder?

The Valid Values for the SupplimintOrder child element list RequestType="Install." What should we use in this field for a supplement order?

Which order id is required for the PriorRequestID child element in the SupplimentOrder? Is it the ISPGW ID or some other value?

Thanks,
Chris

Chris Hight
Sr Broadband Vendor Manager
EarthLink, Inc
W: 4047487072
M: 4048409490
C@corp.earthlink.net

Chris,

Subject: Conversion of West XML Batch Ordering to Real Time Interface

- Verizon will be implementing a Broadband Ordering System Conversion. The conversion includes the retirement of the West CGW/Batch Ordering.
- All West Ordering Activity will need to be placed via a Real Time Interface.
- The ISP Gateway Kit Documentation is attached for your reference.

The time line is as listed below:

ISP Gateway Kit-Delivered: 10/21/2009
ISP Coding- Must be completed by 12/21/2009
SIT Testing: 12/22/2009-01/10/2009

Should you have any questions/concerns I will be your point of contact.

Regards,
Margaret Torrez
National Service Fulfillment
325 942 4723

From: Janet Russell [mailto:russelljan@corp.earthlink.net]
Sent: Friday, February 05, 2010 1:24 PM
To: Bewick, Penny
Cc: Manzano, Stacey; Christopher Hight
Subject: RE: National ISP Gateway Kit - Frontier

Penny,

Just in case there is some confusion, I want to be sure Verizon knows we have
not stopped work on the Realtime ISP gateway work that they are turning off
on 3/21.

As you know, MIS is not moving forward on the Frontier related dev work.
But Chris Hight continues to try to gather data from Verizon related to the
Frontier transition, so that MIS can contiue their LOE determination. If you
feel we should stop that activity altogether, please let us know.

Thanks for the support on this.

jr

Janet Russell
Sr. Product Manager - Broadband Services
EarthLink, Inc. - www.earthlink.net
Office: 404-748-6528
Cell: 678-612-2130

EXHIBIT 2

From: Benvenuti, Teresa [mailto:teresa.benvenuti@verizon.com]
Sent: Tuesday, February 02, 2010 10:28 AM
To: Christopher Hight
Cc: Philip Weinmeister; Montalbano, Frank; Silvestri, Ralph J (Ralph); Manzano, Stacey; Janet Russell; Torrez, Margaret R (MARGARET)
Subject: RE: National ISP Gateway Kit

Chris,
Yes the WV orders will continue BAU until 6/30/10.

Teresa

Teresa Benvenuti
Verizon Corporate Marketing
Consumer Product Development - Fios &HSI
(914)741-8495 (Office)
(914)741-2084 (Fax)

From: Christopher Hight [mailto:c@corp.earthlink.net]
Sent: Tuesday, February 02, 2010 10:14 AM
To: Benvenuti, Teresa
Cc: Philip Weinmeister; Montalbano, Frank; Silvestri, Ralph J (Ralph); SManzano@newedgenetworks.com; Janet Russell; Torrez, Margaret R (MARGARET)
Subject: RE: National ISP Gateway Kit

Terri,

Can you confirm that we will continue to send WV orders to the Verizon URL until 6-30?

Thanks,
Chris

From: Overby, Russell L [mailto:russell.overby@verizon.com]
Sent: Friday, January 29, 2010 4:28 PM
To: Christopher Hight
Cc: Philip Weinmeister; Montalbano, Frank; Benvenuti, Teresa; Silvestri, Ralph J (Ralph); SManzano@newedgenetworks.com; Janet Russell; Torrez, Margaret R (MARGARET)
Subject: RE: National ISP Gateway Kit

Hi Chris,

Couple of answers before I get out of here.

1. When is the deadline to use the new Frontier URL for trouble tickets? It sounds like 6/30 but please clarify.

The new Netway interfaces for the SpinCo (Frontier) areas will be in place on March 26, 2010 and will be used starting from that date.

2. On 3/26 what happens to new orders that get sent to the wrong URL? Will they reject?

They will be "messaged" back to you indicating that these orders need to be put into the correct interface. The messaging is being developed and you will be made aware of these changes.

In the future, these questions should be asked of Teresa Benvenuti and continue to also go to Margaret for the time being

Chris, been great hearing from you as always.

Russ Overby
Management Consultant
Project North - Product Management
russell.overby@verizon.com
214-513-6620 (work)
817-807-3864 (cell)
From: Christopher Hight [mailto:c@corp.earthlink.net]
Sent: Thursday, January 28, 2010 2:29 PM
To: Torrez, Margaret R (MARGARET); Janet Russell; SManzano@newedgenetworks.com
Cc: Philip Weinmeister; Montalbano, Frank; Overby, Russell L
Subject: RE: National ISP Gateway Kit

Margaret and Russ,

We have a couple more questions.

3. When is the deadline to use the new Frontier URL for trouble tickets? It sounds like 6/30 but please clarify.
4. On 3/26 what happens to new orders that get sent to the wrong URL? Will they reject?

Thanks,
Chris

Chris Hight
Sr Broadband Vendor Manager
EarthLink, Inc
W: 4047487072
M: 4048409490
C@corp.earthlink.net

From: Torrez, Margaret R (MARGARET) [mailto:margaret.torrez@verizon.com]
Sent: Wednesday, January 27, 2010 11:35 AM
To: Christopher Hight; Janet Russell; SManzano@newedgenetworks.com
Cc: Heather Marsten; Philip Weinmeister; Montalbano, Frank; Overby, Russell L
Subject: RE: National ISP Gateway Kit

Hello Chris,

Here is the West Conxx Report.

Enjoy!

Margaret

From: Christopher Hight [mailto:c@corp.earthlink.net]
Sent: Tuesday, January 26, 2010 4:23 PM
To: Torrez, Margaret R (MARGARET); Janet Russell; SManzano@newedgenetworks.com
Cc: Heather Marsten; Philip Weinmeister; Montalbano, Frank; Overby, Russell L
Subject: RE: National ISP Gateway Kit

Margaret and Russ,

March 26 is one day after we move lineshare ordering to the ISP gateway. We will not even have enough time to verify that those orders are working before we would need to implement new changes for Frontier. We will try to come up with a solution but the odds of having anything in place for the 3/26 release are remote. I will get back to you.

Chris

P.S. Margaret, you owe me a West CONXX report.

From: Torrez, Margaret R (MARGARET) [mailto:margaret.torrez@verizon.com]
Sent: Tuesday, January 26, 2010 4:04 PM
To: Christopher Hight; Janet Russell; SManzano@newedgenetworks.com
Cc: Heather Marsten; Philip Weinmeister; Montalbano, Frank; Overby, Russell L; Torrez, Margaret R (MARGARET)
Subject: RE: National ISP Gateway Kit

Hello Chris and Janet,

Please look at the response from the Team working the Spinco Project .

Thanks Russ for providing answers!

Margaret,

Sorry for the delay in getting these responses back to you.

Before these answers can go out to EarthLink, I would ask that Ralph and Teresa review and approve these for release as they will have the lead on this for SpinCo going forward.

Here are my answers to EarthLink's questions.

1. In the spec it appears that Frontier is referred to as "SpinCo" and Verizon is "RetainCo." Please confirm.

   Yes, the Frontier area is SpinCo and the Verizon area is RetainCo. Both areas will remain Verizon until the close of the sale to Frontier currently targeted for 6-30-2010.

2. Did Verizon sell all lines in the SpinCo states or just some of the lines? It sounds like I need to filter ELNK's CLLI list and divert orders accordingly. We will need a current CLLI list from Verizon to do so.

   Verizon will be selling all the lines in the following states to Frontier. Services ordered on these lines in the SpinCo areas will be through the ISP XML Gateway associated with the SpinCo URL (TBD) starting 3-26-2010. These states include WA, OR, ID, NV, AZ, WI, MI, IL, IN, OH, NC, SC.

   In addition, Verizon will be selling all lines associated with the following CLLIs in the CA region. Once again, services ordered on these lines will be placed in the SpinCo areas through the ISP XML Gateway associated with the SpinCo URL (TBD) starting 3-26-2010.

Switch CLLI
BLYTCAXF92K
GRDVNVXADS0
PRKRAZXCDS0
BKMTCAXFQ01
BMMTCARSQ02
CRCYCAXFDS1
SMRVCAXFDS1

   Verizon will be selling all the lines in West Virginia to Frontier. Services ordered on these lines in the RetainCo areas through the ISP XML Gateway associated with the existing URL will continue until 6-30-2010. Starting 7-1-2010, services ordered for the West Virginia area will be through Frontier ordering and provisioning systems and not ISP XML Gateway. Details will be provided at a later date.

3. Do the provisions of our current Verizon BTAS contract apply for SpinCo lines?   By this I mean the same rates, bounties, SLAs, and measurement periods, etc.

   Yes, the current Terms and Conditions for your Verizon BTAS Agreement will apply for both RetainCo and SpinCo lines until June 30, 2010. After 6-30-2010, new Terms and Conditions will need be put into place for both the Frontier and Verizon areas that are specific to each area.

4. Is there a Frontier account manager or contact for us in case we have questions?

   The currently assigned Account Manager for your account is Jim Dugan for the RetainCo area, and Nasser Sheikh for the SpinCo area.

5. Do SpinCo GATBs count for our Verizon rate tier measurements?

Yes, the SpinCo area GATB counts will apply to the current Verizon BTAS Agreement until 6-30-2010.

6. When will the new SpinCo URLs be available?

    New URLs for the SpinCo area for ISP XML Gateway have not been assigned yet. These new URL should be available within the next several weeks.

7. Is there a due date to have this change implemented?

    Current plans are for these changes to be in place with the IT code release on the March 26, 2010 weekend.

8. To the best of your knowledge will these changes be permanent (and in step with future Verizon spec changes) or will Frontier develop their own spec?

    These changes will be permanent. Frontier may make changes to these specifications after 7-1-2010 at their determination.

9. What happens to follow-up orders (discos and speed changes) for existing VZ lines in the SpinCo areas? Do we need to divert them to the new SpinCo URLs?

    Initial and follow-up order activity after 3-26-2010 will need to be directed to the corresponding correct RetainCo or SpinCo URL for exiting Verizon lines in those respective areas.

10. Who will handle support and service for lines in the SpinCo areas? Do we still call the applicable Verizon MCO or do we need to work with Frontier?

    Support and services for lines in either SpinCo areas or RetainCo areas will continued to be supported by Verizon up to 6-30-2010. New centers are currently being set up and brought online to provide support to the SpinCo areas prior to close of the sale to Frontier on 6-30-2010. You will be notified via ISP Communications or other methods as to when these new centers will be operational in order to direct your calls or requests to the correct center.

11. Is there a corresponding new spec for trouble tickets in SpinCo areas?

    The current general specification with regards to Netway are not currently being changed. A new URL will be established for Netway in the SpinCo areas. Trouble ticket activity will need to be directed to the correct URL either RetainCo or SpinCo.   New URLs for the SpinCo area for Netway have not been assigned yet. These new URL should be available within the next several weeks.

12. Do we need to start over on our "real time" coding to accommodate prequal and ordering in the Frontier areas?

    No, it is our understanding that the current coding EarthLink is undertaking will apply to either RetainCo or SpinCo.

Once again, before these responses go out to EarthLink, I ask Ralph and Teresa to review and comment.

Any questions, please let me know.

Russ Overby
Management Consultant
Project North - Product Management
russell.overby@verizon.com
214-513-6620 (work)
817-807-3864 (cell)

From: Christopher Hight [mailto:c@corp.earthlink.net]
Sent: Thursday, January 21, 2010 3:59 PM
To: Torrez, Margaret R (MARGARET); Janet Russell; 'SManzano@newedgenetworks.com'
Cc: Heather Marsten; Philip Weinmeister; Montalbano, Frank
Subject: RE: National ISP Gateway Kit

Margaret,

Any news? The answers to some of these questions will tell EarthLink the scale of development work to accommodate Frontier. We cannot submit requirements to IT without them unfortunately. I can promise you that some EarthLinkers will have a heart attack after the hoops we made them jump through for the real time changes. In light of that, I want to get the requirements to IT quickly so they can start scheduling the work. It would be best if EarthLink could work on this with no deadline while agreeing to release the changes this year.

Thank you,
Chris

From: Christopher Hight
Sent: Friday, January 15, 2010 10:47 AM
To: 'Torrez, Margaret R (MARGARET)'; Janet Russell; 'SManzano@newedgenetworks.com'
Cc: Heather Marsten
Subject: RE: National ISP Gateway Kit

Margaret,

We did not get a response on this email. I have a better idea of what EarthLink will need to do for Frontier after the Monday call but I want to make sure how to proceed. I removed some questions that we can figure out later. Can you clarify the rest?

1. Did Verizon sell all lines in the SpinCo states or just some of the lines? It sounds like I need to filter ELNK's CLLI list and divert orders accordingly. We will need a current CLLI list from Verizon to do so.
2. Is there a Frontier account manager or contact for us in case we have questions?
3. When will the new SpinCo URLs be available?
4. Is there a due date to have this change implemented?
5. To the best of your knowledge will these changes be permanent (and in step with future Verizon spec changes) or will Frontier develop their own spec?

6. What happens to follow-up orders (discos and speed changes) for existing VZ lines in the SpinCo areas? Do we need to divert them to the new SpinCo URLs?
7. Is there a corresponding new spec for trouble tickets in SpinCo areas?

Thanks,
Chris

Chris Hight
Sr Broadband Vendor Manager
EarthLink, Inc
W: 4047487072
M: 4048409490
C@corp.earthlink.net

From: Christopher Hight
Sent: Monday, December 14, 2009 12:17 PM
To: Torrez, Margaret R (MARGARET); Janet Russell; SManzano@newedgenetworks.com
Cc: Heather Marsten
Subject: RE: National ISP Gateway Kit

Hello Margaret,

I read the new spec and had some questions. I cc'd a few people on my side that will need to be aware of the changes. Here is some background information for them.

Earlier this year Verizon sold its wire lines in 13 Verizon West states to Frontier, a total of 4.8 million households. These states are WA, OR, ID, NV, AZ, WI, MI, IL, IN, OH, NC, SC, CA + West Virginia. Nothing has changed on the Verizon side in these areas for ordering or support until now. The new spec requires that we divert prequals and orders for Frontier lines in these states to new URLs, which are to be determined. Depending on the scope of the changes, we will need to either update NPA/NXX and RacerX or add a completely new vendor into the EarthLink systems.

Here are my questions.

1. In the spec it appears that Frontier is referred to as "SpinCo" and Verizon is "RetainCo." Please confirm.
2. Did Verizon sell all lines in the SpinCo states or just some of the lines? It sounds like I need to filter ELNK's CLLI list and divert orders accordingly. We will need a current CLLI list from Verizon to do so.
3. Do the provisions of our current Verizon contract apply for SpinCo lines? By this I mean the same rates, bounties, SLAs, and measurement periods, etc.
4. Is there a Frontier account manager or contact for us in case we have questions?
5. Do SpinCo GATBs count for our Verizon rate tier measurements?
6. When will the new SpinCo URLs be available?
7. Is there a due date to have this change implemented?
8. To the best of your knowledge will these changes be permanent (and in step with future Verizon spec changes) or will Frontier develop their own spec?
9. What happens to follow-up orders (discos and speed changes) for existing VZ lines in the SpinCo areas? Do we need to divert them to the new SpinCo URLs?
10. Who will handle support and service for lines in the SpinCo areas? Do we still call the applicable Verizon MCO or do we need to work with Frontier?
11. Is there a corresponding new spec for trouble tickets in SpinCo areas?

12. Do we need to start over on our "real time" coding to accommodate prequal and ordering in the Frontier areas?

Thanks,
Chris

Chris Hight
Sr Broadband Vendor Manager
EarthLink, Inc
W: 4047487072
M: 4048409490
C@corp.earthlink.net

From: Torrez, Margaret R (MARGARET) [mailto:margaret.torrez@verizon.com]
Sent: Friday, December 11, 2009 5:56 PM
To: Christopher Hight
Cc: ISP Gateway Distribution; Torrez, Margaret R (MARGARET)
Subject: National ISP Gateway Kit

fyi,

This is the latest documentation for the National ISP Gateway Kit.

This ISP Gateway Kit will be used for both Verizon and Frontier.

Please note the URLs for Frontier will be different than Verizon's. The Frontier URLs will be provided at a later time.

At this point there is no UAT for Frontier.

Please note CA Lata 730 has certain locations/cllis that are mapped to Frontier. These cllis are listed on the ISP Gateway Kit documentation.

Regards,
Margaret

EXHIBIT 3

From: Wheeler, Greg W [mailto:greg.w.wheeler@verizon.com]
Sent: Friday, March 12, 2010 5:15 PM
To: Christopher Hight; La Haye , George D
Cc: Spears, Josiah
Subject: RE: EarthLink Escalate

Chris,

Yes exactly!   The new Everett, Washington MCO is taking calls for all the 12 Frontier States.

Greg

From: Christopher Hight [mailto:c@corp.earthlink.net]
Sent: Friday, March 12, 2010 2:10 PM
To: Wheeler, Greg W; La Haye , George D
Cc: Spears, Josiah
Subject: RE: EarthLink Escalate

Thanks Greg,

One last question. If your group is only taking calls for CA, who should we call
for ID, NV, and OR? I am guessing Everett but please confirm. Is the Everett MCO
taking calls for the 12 frontier states? Ok, that's two questions.

Thanks,
Chris

-----Original Message-----
From: Wheeler, Greg W [mailto:greg.w.wheeler@verizon.com]
Sent: Friday, March 12, 2010 5:02 PM
To: Christopher Hight; La Haye , George D
Cc: Spears, Josiah
Subject: RE: EarthLink Escalate

Hello Chris,

I have forwarded this e-mail on to Leon Phillips who is a Supervisor
with the Everett, Washington MCO. Our Long Beach, Ca MCOW office here
now only handles California customers. For any of your Washington State
customers you should contact the Everett, Wahington MCO at (877)
626-7220.

Greg

-----Original Message-----
From: Christopher Hight [mailto:c@corp.earthlink.net]

George and Greg,

We have an escalate from an executive and received a strange response
when calling the West MCO. The customer is in Washington state. We were
told that your group does not handle Washington state any longer. I have
not had any notification of changes amongst the MCO's. Do you know how
we should proceed and who we should call?

Here is the issue we are trying to resolve.
The customer has intermittent surf issues. She's on dry loop and it's
been up and down for the last month. It hasn't gotten fixed so she
escalated through a VP. Yesterday a dispatch was made. The tech rewired
the DMARC which made the service worse and also messed up her security
system. She wants someone back out there today to put everything back
the way it was. She also wants the service issue corrected.

Ticket WAST050202
User Firstname ▇▇▇▇
User Lastname ▇▇▇▇▇▇
User Address1 ▇▇▇▇▇▇▇▇
User Address2
User City SNOHOMISH
User State WA
User Zip ▇▇▇▇▇
Service Phone ▇▇▇▇▇▇
User Contact Phone ▇▇▇▇▇▇

Thanks,
Chris

Chris Hight
Sr Broadband Vendor Manager
EarthLink, Inc
W: 4047487072
M: 4048409490
C@corp.earthlink.net

EXHIBIT 4

From: Christopher Hight [mailto:c@corp.earthlink.net]
Sent: Thursday, March 25, 2010 11:13 AM
To: Bewick, Penny
Cc: Jennifer P. Bagg
Subject: RE: Verizon/Frontier

Here are the hours of work required by each EarthLink team that is making changes for SpinCo

RacerX (middleware): 44 hrs
Spritle (sales app): 40 hrs
SR2 (provisioning system): 80 hrs
Vantive (CRM): 90 hrs
QE (testing): 196 hrs
Back Office Interfaces: 40
Total: 490

Here are the larger changes.
- Update RacerX Request Maintenance logic to include a tag identifying the transaction as a Frontier-specific one whenever a Frontier-territory order is encountered
- Update RacerX Request Maintenance configuration to override the 'ilec' field with the value 'fro' whenever a Frontier-territory order is encountered, for all configured Verizon West RacerX transactions
- Sweep existing Verizon West customers, and add the identifying Speedracer Extra and Order Detail records for customers in the Frontier territory
- Replicate sweep records from SR2 (provisioning system) to CRM (Vantive) and associate it with existing customer records.
- Modify CRM to display the new vendor designation and include logic to send trouble ticket, line tests, and ticket updates to Frontier URL.
- Update Earthlink RADIUS to allow authentication requests from Frontier servers, establish security certificates and connectivity.
- Create Frontier as a vendor in all customer databases.
- Add Frontier as a vendor to NPA/NXX (serviceability) databases and logic so that Prequal will send Frontier quals to the new URL.
- Update Sale app to display

The reason we could not just simply leave our existing VZW customers in Frontier territory as VZW in our systems is because we will need to call a different vendor phone number to support them. If all we did was route requests to the appropriate URL, it would confuse agents who need to know which vendor they are working on. They would log into the wrong vendor websites to work on tickets and orders. See the attachment where Verizon confirmed that trouble ticket calls would be handled by a different group representing Frontier. They are already taking these calls.

Thanks,
Chris

Chris Hight
Sr Broadband Vendor Manager
EarthLink, Inc
W: 4047487072
M: 4048409490
C@corp.earthlink.net